

ARGUMENTS

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendments. The attached page is
5 captioned **“Version with markings to show changes made”**.

1. Claims 1, and 4 are rejected under 35 U.S.C §102 (a) as being anticipated by Applicant’s Prior Art (Figure 1).

2. Claims 2 and 3 are rejected under 35 USC §103 (a) as being unpatentable Deepal et al.(US 5,098,864)

10 Applicant thinks that it is true that Applicant’s Prior Art does not disclose that the lower metal sheets are formed with a first hole and upper metal sheets are formed with second metal sheets, and an encapsulant is filled into the first hole and the second hole. Consequently, the upper metal sheets and the lower metal sheets may package tight.

15 According to the examiner’s opinion, please refer to Applicant’s Prior Art (Figure 1), which is shown an image sensor package having lower metal sheets 10, upper metal sheets 12, encapsulant 14.

Thus, the Applicant’s Prior Art does not disclose a similar structure to that of this application, and does not motivate the Applicant to finish this application.

20 Reconsideration of the Claims 1, and 4 are politely requested.

Applicant thinks that it is true that 864, patent does not disclose that An image sensor includes plural lower metal sheets, plural upper metal sheets stacked on the lower metal sheets, and an encapsulant is for encapsulating the lower and upper metal sheets. The lower metal formed with a first hole, the upper metal
25 sheets formed a second hole penetrated from the upper surface to the lower surface. Wherein the encapsulant is filled into the second hole and first hole to

tighten the upper metal sheets and the lower metal sheets. A photosensitive chip arranged within the chamber, plural wires for electrically connecting the chip to the upper surfaces of the lower metal sheets, and a transparent layer arranged on the frame layer to cover the chip. Consequently, the upper metal sheets and the lower metal sheets may package tight.

According to the examiner's opinion, please refer to 864, patent Applicant's, which is shown an process for manufacturing a metal pin grid array package,

Thus, the 864, patent does not disclose a similar structure to that of this application, and does not motivate the Applicant to finish this application. Reconsideration of the Claims 1 - 4 is politely requested.

Thank you for your consideration.

Respectfully submitted,

Date: 5/6/2005 Jichen WU
Jichen WU

Title of Officer: Manager of Kingpak Technology Inc.,
the Assignee of this application

Address: No. 84, Taiho Road, Chupei, Hsinchu Hsien, Taiwan